

EVAN MILLIGAN, et al.)	
)	
Plaintiffs,)	
)	
v.)	
)	
WES ALLEN, in his official)	Case No.: 2:21-cv-
capacity as Secretary of State)	1530-AMM
of Alabama, et al.,)	THREE-JUDGE COURT
)	
Defendants.)	

R. Quin E. Hillyer (“Hillyer”), a long-time resident of the City of Mobile and Mobile County, requests permission to appear as *amicus curiae* to put a proposed remedial plan before the court. That remedial plan preserves the integrity of Mobile County, and *amicus* will explain the basis for doing so in his supporting brief and its exhibits. As grounds for this Motion, Hillyer states:

1. He is a long-time resident of Mobile and Mobile County, and has contributed to his local community.

2. Mobile County should not be split because its citizens have demonstrated that they can work together across racial lines. While the City of Mobile was white-majority, it elected the African-American Democrat Sam Jones as mayor twice. Since 2013, the City has been African-American majority and has elected white Republican Sandy Stimson three times as mayor. Other facts in Hillyer's Declaration show that the City and County of Mobile support the consideration of the City and County as a unitary community of interest.

3. Hillyer's plan further demonstrates an adherence to race-neutral redistricting criteria, including compactness, contiguity, and the preservation of county lines. The preservation of Mobile County as an integral part of a district further preserves a significant community of interest.

4. To the extent allowed by the program Hillyer used, the population deviations between districts are minimal, in that all seven districts are more than 99.915% compliant with the mean district population. Furthermore, if absolute population is required, only six precincts will have to be split.

5. The State of Alabama has no objection to Hillyer's participation, The Castor Plaintiffs and the Milligan Plaintiffs take no position on this Motion.

WHEREFORE, Hillyer should be permitted to participate as an *amicus curiae* and submit his proposed remedial plan to the court for its consideration.

Respectfully submitted this the 6th day of September 2023

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CERTIFICATE OF SERVICE

I certify that on this the 6th day of September 2022, I electronically filed the foregoing Motion of Quin Hillyer for Permission to Appear as *Amicus Curiae* using the U.S. District Court for the Northern District of Alabama, Southern Division's electronic filing system, which will send notice of and an accompanying link to this Motion of Quin Hillyer for Permission to Appear as *Amicus Curiae* to the parties who have previously appeared in this case.

/s/ John J. Park Jr
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